

U.S. Department of Justice

Washington, DC 20530

**Amendment to Registration Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. File this amendment form for any changes to a registration. Compliance is accomplished by filing an electronic amendment to registration statement and uploading any supporting documents at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant

Capitol Counsel LLC

2. Registration No.

6328

3. This amendment is filed to accomplish the following indicated purpose or purposes:

- ☐ To give a 10-day notice of change in information as required by Section 2(b) of the Act.
- ☒ To correct a deficiency in
- ☐ Initial Statement
- ☐ Supplemental Statement for the period ending \_\_\_\_\_
- ☒ Other purpose (*specify*) To amend the Exhibit B filed on 11/19/2018.
- ☐ To give notice of change in an exhibit previously filed.

4. If this amendment requires the filing of a document or documents, please list:

Agreement with China-United States Exchange Foundation ("CUSEF").

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. (*If space is insufficient, a full insert page must be used.*)

Registrant's written agreement with CUSEF was inadvertently omitted from the Exhibit B filed on November 19, 2018. The agreement is attached to this amendment.

---

**EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature<sup>1</sup>)

December 10, 2018

/s/ John D. Raffaelli

eSigned

---

<sup>1</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**CAPITOL COUNSEL LLC**

**2<sup>ND</sup> FLOOR**

**700 13<sup>TH</sup> STREET, NW**

**WASHINGTON, DC 20005**

**(202) 861-3200**

**December 15, 2014**

**Mr. Alan Wong  
Executive Director  
China-United States Exchange Foundation  
15/F, Shun Ho Tower  
24-30 Ice House Street  
Central, Hong Kong**

**Dear Mr. Wong,**

**We are pleased to submit this agreement between Capitol Counsel LLC ("Capitol Counsel") and the China-United States Exchange Foundation ("CUSEF") for government affairs representation. Effective December 1, 2014, CUSEF will engage Capitol Counsel to assist in representation before Congress. Such representation will include:**

- Policy and political intelligence gathering and analysis on China issues**
- Substantive advice on China-related legislation**
- Arranging meetings and programs on Capitol Hill**
- Dissemination within Congress of materials generated or sponsored by CUSEF**
- Organization of and participation in CUSEF's former Members of Congress activities**
- Coalition building with the U.S. Association of Former Members of Congress**
- Advocacy, as directed**

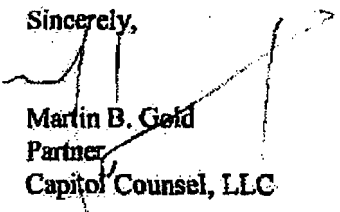
**At Capitol Counsel, Martin B. Gold will manage this engagement. He will involve other Capitol Counsel professionals as may in his judgment be appropriate, with your approval. He will proceed at your direction and in coordination with other CUSEF consultants based in the United States.**

**In consideration for such services, CUSEF will pay Capitol Counsel a monthly retainer of \$10,000, payable within thirty days of invoice. Reasonable and itemized expenses for local transportation, messenger services, research materials, meals, and out-of-town travel approved in advance will be billed separately on the monthly invoice. Any individual out-of-pocket expenses exceeding one thousand dollars (\$1,000) shall be incurred only with CUSEF's prior written approval. These expenses include but not limited to event coordination, advertising, catering and the like. Capitol Counsel does not bill separately for faxes, telephones, and secretarial costs.**

This agreement shall continue until December 31, 2015, and may be continued thereafter indefinitely on a month-to-month basis, subject to cancellation on thirty days written notice. Capitol Counsel agrees all confidential information furnished by the League or otherwise developed in connection with this representation may be used by Capitol Counsel only for the purpose of representation under this agreement. Capitol Counsel stipulates it will not disclose such information to any third party without securing express prior consent of CUSEF.

If these terms meet with your approval, please sign and date below, return one copy to our offices and retain the other copy for your files.

Sincerely,

  
Martin B. Gold  
Partner  
Capitol Counsel, LLC

Agreed and accepted:

  
Mr. Alan Wong  
Executive Director  
China-United States Exchange Foundation

16 DEC 2016